



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

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March 6, 2024

VIA ECF

Honorable Philip M. Halpern
U.S. District Court, Southern District of New York
Hon. Charles L. Brieant Jr. Federal Building and U.S. Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

DIVISION OF STATE COUNSEL

Application granted.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 7, 2024

Re: Williams v. Lohard et al., No. 20 Civ. 10571 (PMH)

Dear Judge Halpern:

This office represents Defendant Matthew Hughes in the above-referenced case. I write on behalf of both Defendant Hughes and Plaintiff to respectfully request a one-week extension of time – from March 7 to March 14, 2024 – for the Parties to submit their joint Rule 56.1 Statement, and for Defendant Hughes to submit his pre-summary judgment motion letter; and then a one-week extension of time – from March 14 to March 21, 2024 – for Plaintiff to then submit his pre-motion opposition letter.

The grounds for this request are that Plaintiff recently settled his claims with co-Defendant Lahar, and now intends to update his Counter-statement to include certain facts that had been in co-Defendant Lahar's now-moot section of the joint Rule 56.1 Statement, to which Defendant Hughes will then need to respond. Plaintiff has committed to providing this revised Counterstatement to Defendant Hughes no later than March 8, 2024.

This is a joint request, and there have been no prior requests for an extension of this date.

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The Parties appreciate the Court's time and attention to this matter.

Respectfully submitted,

/s/ Daniel S. Kirschbaum

Daniel S. Kirschbaum
Assistant Attorney General

cc: All counsel (by ECF)